

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Miami Division**

DONALD J. TRUMP,

*Plaintiff,*

v.

MICHAEL D. COHEN,

*Defendant.*

Case No. 23-cv-21377-DPG

**DEFENDANT’S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME AND  
LEAVE TO FILE EXCESS PAGES FOR REPLY TO PLAINTIFF’S RESPONSE TO  
MOTION TO DISMISS**

Defendant Michael D. Cohen (“Defendant”), by and through undersigned counsel, moves on an unopposed basis for (i) enlargement of the time permitted for a reply under S.D. Fla. Local Rule 7.1(c)(1); and (ii) leave to exceed the page limitation of S.D. Fla. Local Rule 7.1(c)(2) for his forthcoming reply to Plaintiff’s Response in Opposition to Defendant Michael D. Cohen’s Motion to Dismiss Plaintiff’s Complaint (“Plaintiff’s Response”) [D.E. 26].

Plaintiff’s 32-page Complaint raises a host of complex factual and legal issues, which are discussed in Defendant’s Motion to Dismiss [D.E. 11] and Plaintiff’s Response. This complexity required both parties to file motions for leave to exceed the 20-page limit prescribed by S.D. Fla. Local Rule 7.1(c)(2) in their respective filings. *See* [D.E. 9] and [D.E. 24]. Among the issues raised in the filings are questions of choice of law, which require the parties to devote time and page-space to discuss the law of two jurisdictions within each argument.

In order to sufficiently address the arguments made in Plaintiff’s 31-page Response, Defendant requires up to 20-pages and an additional ten days for his reply. Defendant has conferred

with Plaintiff's counsel who represents that Plaintiff has no objection to the relief sought in this motion.

WHEREFORE, Defendant respectfully requests that this Court grant him (i) a ten-day enlargement of time to file his reply to Plaintiff's Response, extending the filing deadline from June 12, 2023 to June 22, 2023; and (ii) leave to file a reply to Plaintiff's Response that does not exceed 20 pages.

**LOCAL RULE 7.1(a)(3) CERTIFICATE OF CONFERRAL**

The undersigned certifies that he conferred with counsel for the Plaintiff on June 8, 2023 in a good faith effort to resolve the issues raised in this motion. Counsel for the Plaintiff stated that he has no objection to the relief sought herein.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this June 9, 2023, a copy of this filing was submitted electronically via the CM/ECF system to all parties that have entered an appearance in this case and on the Court's electronic system.

By: /s/ Benjamin H. Brodsky  
Benjamin H. Brodsky